

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

DIANA COATES AND
MARGO GREEN,
PLAINTIFFS,

V.

CIVIL ACTION NO. 3:10-CV-71

BRAZORIA COUNTY, AND
JAMES BLACKSTOCK,
DEFENDANTS.

DEFENDANT, JAMES BLACKSTOCK'S, VOIR DIRE SUBMISSIONS

Defendant, James Blackstock, submits these his voir dire inquiries to be submitted as part of the Joint Pretrial Order.

Statement of Case

James Blackstock is a former elected official who sat on the County Court at Law bench in Brazoria County; he no longer sits on the bench and is no longer a judge. Blackstock tendered his resignation after pleading nolo contendere to official oppression charges. This case involves claims of sexual harassment and state court claims of intentional infliction of emotional distress and assault; the charges were filed after Blackstock resignation from the bench. He denies the complaints. He denies that he was ever the employer of Plaintiffs.

General Background on Information That Affects This Case

1. Who of you subscribe to any newspaper, or read the newspaper regularly (whether hard copy or on-line edition)? Please identify the paper.

2. Who of you have heard of a former federal judge, who sat on this bench and in this very courtroom, Samuel B. Kent? What have you heard?

3. Who of you have heard of that judge (Kent) being removed from the bench for sexual harassment and lying? Will that knowledge of Samuel B. Kent's case affect you in this case - which involves a state court judge resignation from the bench after official oppression charges in Brazoria County then subsequent charges of sexual harassment?

4. Who of you knowing the little I have told you simply can not be fair to either the Plaintiffs or the Defendants; tell me why?

5. Who of you know James Blackstock, heard of his name before, been before his court or read or heard anything in the media with respect to James Blackstock and a sexual harassment lawsuit? Tell me what you know. Does that affect you from being fair in this case?

6. Do any of you feel that if a judge resigns from the bench after charges of official oppression that the person is probably guilty of violating the same person's civil rights in a civil case? Please explain.

7. Can I assume that, even if I told you that is not true, - just because you have plead "nolo contendere" in a criminal case does not mean that you are liable in a civil rights case - that your position remains the same and you still believe that once you plead on the criminal matter, you are liable on the civil rights case? Is that your feeling or position? Who agrees with this position.

Knowledge of the Parties

8. I will read the witness lists of the parties, please identify whether you know any of the parties, to-wit:

- Plaintiffs' Witness List
- Defendant County of Brazoria's Witness List
- Defendant Blackstock's Witness List

9. Do any of you know the lawyers involved in this case, if so, how and in what manner, does it affect your ability to be fair, if so, how?

10. Do any of you know me, the Judge, and/or anyone on the Court's staff? If so, how and in what manner and does it affect your ability to be fair in this matter?

11. Have you heard and/or read any information with respect to James Blackstock, any trial that he has been involved in and if so does that affect your ability to be fair to any of the parties in this matter.

Law Training/Law Enforcement/EEOC Training

12. Do you have any training in law? Please explain.

13. Do any of you have any training in law enforcement? If so, please explain.

14. Do any of you have any training in EEOC law, EEOC rules and procedures? Please explain?

Previous Complaints of Discrimination

15. Have any of you ever filed a complaint of discrimination against an employer? When, circumstances and results?

16. Have any of you ever felt that you were discriminated against? When and did you complain against the employer?

17. Have any of your family members or person(s) close to you ever filed a complaint of discrimination or filed a discrimination lawsuit against your employer? Please explain.

18. As related to my inquiries associated with discrimination cases, does it affect your ability to be fair in a case such as this? Please explain.

Employment

19. Have you and/or any of your family members ever been an employee of Brazoria County, the Texas Department of Criminal Justice or the Brazoria County Juvenile Probation Department? Please explain.

DATE: February 13, 2012.

Respectfully submitted,

/S/ ANTHONY P. GRIFFIN

ANTHONY P. GRIFFIN
A GRIFFIN LAWYERS
1115 TWENTY FIRST STREET
GALVESTON, TEXAS 77550
409.763.0386
1.800.750.5034
FACSIMILE NO. 409.763.4102

STATE BAR NO. 08455300

ATTORNEYS FOR JAMES BLACKSTOCK

CERTIFICATE OF SERVICE

On this the 13th day of February, 2012, the foregoing Defendant James Blackstock's Voir Dire Inquires was forwarded to all parties of interest by electronic transmission consistent with the rules of the Court, to-wit:

BARRY ABRAMS
SUSAN BICKLEY
BLANK ROME, L.L.P.
700 LOUISIANA, SUITE 4000
HOUSTON, TEXAS 77002

JACQUELINE A. ARMSTRONG
ATTONREY AT LAW
11111 KATY FREEWAY, SUITE 910
HOUSTON, TEXAS 77079

/S/ ANTHONY P. GRIFFIN

ANTHONY P. GRIFFIN